

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND	:	HON. ROBERT B. KUGLER
IRBESARTAN PRODUCTS LIABILITY	:	HON. JOEL SCHNEIDER
LITIGATION	:	MDL No. 19-2875 (RBK/JS)
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	:	

**AFFIDAVIT PURSUANT TO THE DISTRICT OF NEW JERSEY
LOCAL RULE 37.1(b)(1)**

I, Jessica M. Heinz, Esq. on behalf of the Aurobindo entities, state that on November 3, 2020, counsel for the Aurobindo entities met and conferred with plaintiffs' counsel, Ben Stellpflug, Esq. of GoldenbergLaw, PLLC and Layne Hilton, Esq. of Kanner & Whiteley, L.L.C. via telephone in an effort to resolve the issues presented in the Aurobindo entities' discovery motion filed on October 29, 2020. The parties were unable to reach an agreement as to any issues presented therein.

I further certify that this statement complies with 28 USC § 1746 relating to unsworn falsifications to authorities and that this statement is true and correct to the best of my knowledge under penalty of perjury.

/s/Jessica Heinz

Jessica Heinz